

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**THE STATE OF LOUISIANA, By and  
through its Attorney General, Elizabeth B.  
Murrill;  
THE STATE OF KANSAS, By and through  
its Attorney General, Kris W. Kobach;  
THE STATE OF OHIO, By and through its  
Attorney General, Dave Yost; and  
THE STATE OF WEST VIRGINIA, By and  
through its Attorney General, John B.  
McCuskey**

*Plaintiffs,*

**vs.**

**UNITED STATES DEPARTMENT OF  
COMMERCE; JEREMY PELTER, in his  
official capacity as Acting Secretary of  
Commerce;  
BUREAU OF THE CENSUS, an agency  
within the United States Department of  
Commerce; and  
ROBERT L. SANTOS, in his official  
capacity as Director of the U.S. Census  
Bureau**

*Defendants.*

**Case No.: 6:25-cv-0076-DCJ-DJA**

**Judge David C. Joseph  
Magistrate Judge David J. Ayo**

**MOTION TO INTERVENE OF THE LEAGUE OF WOMEN VOTERS,  
THE LEAGUE OF WOMEN VOTERS OF FLORIDA, AND  
THE LEAGUE OF WOMEN VOTERS OF NEW YORK STATE**

The League of Women Voters of the United States (“LWV”)<sup>1</sup>, the League of Women Voters of Florida (“LWVFL”), and the League of Women Voters of New York State (“LWVNYS”) (collectively, “the League”), by and through their undersigned counsel, respectfully move to intervene as Defendants in this matter as of right pursuant to Federal Rule of Civil Procedure (“Rule”) 24(a) or in, the alternative, move for permissive intervention pursuant to Rule 24(b). Pursuant to Rule 24(c), Proposed Intervenors’ Memorandum in Support of this Motion and Answer is attached hereto as Attachments 1 and 5, respectively.<sup>2</sup>

Complying with Local Rule 7.6, on April 8, 2025, counsel for LWV, LWVFL, and LWVNYS informed all parties of their proposed intervention and presented their proposed Answer to all parties who have an interest to oppose. Plaintiffs oppose the proposed intervention; proposed Defendant-Intervenors Hannah Victoria Morgan, et. al., and proposed Defendant-Intervenor County of Santa Clara do not oppose the proposed intervention; and as of the time of writing, Defendants have not stated their position.

Dated: April 10, 2025

Respectfully submitted by,

/s/ Avner M. Shapiro

Bradley E. Heard\*

Avner M. Shapiro\*

SOUTHERN POVERTY LAW CENTER

1101 17th St. NW Ste 550

---

<sup>1</sup> The League comprises two branches: the League of Women Voters of the United States (“LWVUS”) and the League of Women Voters Education Fund (“LWVEF”). LWVUS “encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education, and advocacy.” LWVUS is a 501(c)(4) social welfare organization. *See* LWV, Ways to Give, <https://perma.cc/U3VP-HETC>. LWVEF “works to register and provide voters with election information through its election resource VOTE411.org, candidate forums, and debates.”

<sup>2</sup> Proposed Intervenors recognize that this matter has been stayed indefinitely and are filing this motion in an abundance of caution to ensure that, if the case goes forward, their application for intervention is considered along with the other applicants.

Washington, DC. 20036  
(240) 890-1735  
avner.shapiro@splcenter.org  
bradley.heard@splcenter.org

/s/ Rose Murray

Rose Murray, La. Bar No. 34690  
Ahmed K. Soussi, La. Bar No. 38414  
SOUTHERN POVERTY LAW CENTER  
201 St. Charles Avenue, Suite 2000  
New Orleans, LA 70170  
(504) 579-3175  
rose.murray@splcenter.org  
ahmed.soussi@splcenter.org

\* Applications for admission *pro hac vice*  
pending

*Attorneys for Proposed Defendant-Intervenors the National League of Women Voters ("LWV"), the Florida League of Women Voters ("LWVFL"), and the New York League of Women Voters ("LWVNYS")*